

Alan Ruddy, Esq., Assistant County Counsel
Attorney ID#002411975
Office of the Essex County Counsel
Hall of Records, Room 535, 465 Dr. Martin Luther King, Jr., Blvd., Newark, NJ 07102
(973) 621-5021
(Attorney for Defendant, County of Essex, improperly pled as Essex County
Correctional Facility and Essex County Department of Corrections)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
(NEWARK)**

Civil Action No.
Removed from:

: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION: ESSEX COUNTY
: DOCKET NO. ESX-L-4592-21

JOSE VELLON,

Plaintiff,

vs.

Civil Action

COUNTY OF ESSEX, ESSEX
COUNTY DEPARTMENT OF
CORRECTIONS, ESSEX COUNTY
CORRECTIONAL FACILITY, ALFARO
ORTIZ, WILLIAM ANDERSON, GUY
CIRILLO, SERGEANT NICHOLS,
and/or JOHN DOE 1-100 (fictitious
names representing unknown
individuals, and ABC Company 1-100
(fictitious names representing unknown
entities).

Defendants.

**NOTICE OF FILING PETITION
TO UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF
NEW JERSEY FOR REMOVAL
28 U.S.C. §1446(d)**

To: Clerk of the United States District Court
District of New Jersey
Martin Luther King Jr. Courthouse
50 Walnut Street
Newark, NJ 07101

On Notice to: Clerk, Essex County Superior Court
Civil Action Division
Veterans Courthouse – Room 131
Newark, NJ 07102

Daniel T. Dalena, Esq.
Javerbaum, Wurgaft, Hicks, Kahn,
Wikstrom & Sinins, P.C.
201 Washington Street
Newark, NJ 07102
(Attorney for Plaintiff)

SIR/MADAM:

PLEASE TAKE NOTICE that the defendant, County of Essex, improperly pled as Essex County Correctional Facility and Essex County Department of Corrections, on this 30th day of June 2021 filed a Notice of Removal, a copy of which is attached hereto, in the United States District Court for the District of New Jersey, to remove the above-captioned matter from the Superior Court of New Jersey, Essex County, to the United States District Court for the District Court of New Jersey.

You are also advised that the defendants, upon filing of said Notice of Removal, filed a copy of the Notice with all counsel of whom defendants have notice has filed pleadings in this case.

Courtney M. Gaccione
Essex County Counsel
(Attorney for defendant,
County of Essex)

s/Alan Ruddy
Alan Ruddy
Assistant County Counsel

Dated: June 30, 2021

CERTIFICATION OF SERVICE

I hereby certify that the original of the Notice of Petition to the Clerk of the United States District for the District of New Jersey for the Removal and the Notice of Removal were filed with Clerk of the United States District Court for the District of New Jersey, Newark Vicinage, and the Clerk of the Essex County Superior Court of New Jersey, Civil Division, and counsel of record within the time prescribed by the rules of Court.

s/Alan Ruddy
Alan Ruddy
Assistant County Counsel

Dated: June 30, 2021